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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA  
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,  
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HERRERA, ALBA CECILIA PURICA  
HERNÁNDEZ, E.R., HENDRINA VIVAS  
CASTILLO, A.C.A., SHERIKA BLANC, VILES  
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION REGARDING CROSS-  
MOTION BRIEFING SCHEDULING AND  
~~PROPOSED~~ ORDER**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

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Pursuant to Civ. L.R. 6-1(a), 6-2, and 7-12, the parties, by and through their respective counsel, submit this stipulation regarding the cross-motion briefing schedule for the Parties' forthcoming Motions for Summary Judgment (collectively, "the Motions").

**WHEREAS**, Plaintiffs filed this action on February 19, 2025 (ECF No. 1) and an Amended Complaint on March 20, 2025 (ECF No. 74);

**WHEREAS**, Plaintiffs filed a Motion to Postpone Effective Agency Action ("Motion to Postpone") on February 20, 2025, the Court granted the Plaintiffs' Motion to Postpone on March 31, 2025 (ECF No. 93), and Defendants' appealed to the Ninth Circuit challenging the Court's postponement order on April 1, 2025 (ECF No. 94);

**WHEREAS**, the parties' briefing to the Ninth Circuit regarding Defendants' appeal of this Court's postponement order as to Venezuela is pending, and the hearing in the Ninth Circuit regarding Defendants' appeal is scheduled for the week of July 7, 2025;

**WHEREAS**, the parties filed their Joint Case Management Statement on April 16, 2025, in which Plaintiffs stated they may move for summary judgment with respect to both Venezuela and Haiti TPS decisions as soon as practicable (ECF No. 111 at 9);

**WHEREAS**, the Court held the initial case management conference on April 21, 2025 at 1:30 PM via videoconference, during which Defendants indicated they would also be moving for summary judgment, the parties discussed the forthcoming Motions, and the Court advised the parties to meet and confer regarding a cross-motion briefing schedule for the Motions;

**WHEREAS**, at the case management conference the Court also inquired whether Plaintiffs would be moving to postpone the effective date of the Haiti TPS decision;

**WHEREAS**, Plaintiffs' counsel and Defendants' counsel met and conferred on April 25, 2025 to discuss a cross-motion briefing schedule for the Motions, among other issues, and agreed to the proposed briefing schedule;

**WHEREAS**, during the meet and confer, in response to Plaintiffs' inquiry, Defendants advised that if Plaintiffs were to move to postpone the effective date of the Haiti TPS decision, Defendants would oppose the motion on (among other grounds), the ground that the Haiti TPS



1 Date: April 29, 2025

ACLU FOUNDATION  
OF NORTHERN CALIFORNIA

2 /s/ Emilou MacLean

3 Emilou MacLean

Attorneys for Plaintiffs

4 Date: April 29 2025

U.S. DEPARTMENT OF JUSTICE

5 /s/ Sarah L. Vuong

6 Sarah L. Vuong

Attorneys for Defendants

7  
8 **SIGNATURE ATTESTATION**

9 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have  
10 concurred in the filing of this document.

11 ACLU FOUNDATION  
12 OF NORTHERN CALIFORNIA


13 /s/ Emilou MacLean

14 Emilou MacLean

15  
16 **~~PROPOSED~~ ORDER**

17 PURSUANT TO STIPULATION, IT IS SO ORDERED.

18  
19 Dated: April 30, 2025

20   
The Honorable Edward M. Chen  
United States District Judge